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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

NAVAJO HEALTH FOUNDATION - SAGE
MEMORIAL HOSPITAL, INC. (doing
business as "Sage Memorial Hospital"); an
Arizona non-profit corporation,,

Plaintiff,

vs.

RAZAGHI DEVELOPMENT COMPANY,
LLC; a Nevada limited liability company
(doing business as "Razaghi Healthcare"),
AHMAD R. RAZAGHI; individually,
TAUSIF HASAN; individually, DOES 1-10;
ROES A-Z,

Defendants.

RAZAGHI DEVELOPMENT COMPANY,
LLC; an Arizona limited liability company,,

Counterclaimant and
Third-Party Plaintiff,

vs.

CHRISTI EL-MELIGI; an unmarried person,
NETRISHA DALGAI; an unmarried person,
STEPHEN D. HOFFMAN and JANE DOE
HOFFMAN; a married couple, LEWIS
BRISBOIS BISGAARD & SMITH, LLP; a
California Limited Liability Partnership,,

Third Party Defendants.

Case No. 2:19-cv-00329-GMN-EJY

**STIPULATION TO EXTEND TIME TO
RESPOND TO THIRD-PARTY
COMPLAINT**

[FIRST REQUEST]

1 and

2 NAVAJO HEALTH FOUNDATION - SAGE
3 MEMORIAL HOSPITAL, INC. (doing
4 business as "Sage Memorial Hospital"); an
Arizona non-profit corporation,

5 Counterdefendant.

6 Third-Party Plaintiff RAZAGHI DEVELOPMENT COMPANY, LLC (hereinafter "RDC")
7 and Third-Party Defendant LEWIS BRISBOIS BISGAARD & SMITH LLP (hereinafter "Lewis
8 Brisbois"), through their respective counsel, hereby submits the following Stipulation to Extend
9 Time to File Response to Second Amended Third-Party Claims:

10 **RECITALS**

11 WHEREAS, RDC filed its Second Amended Third-Party Claims [ECF No. 217] on
12 November 29, 2022;

13 WHEREAS, Lewis Brisbois' Las Vegas office received RDC's Summons and Second
14 Amended Third-Party Claims on or about December 9, 2022;

15 WHEREAS, on December 27, 2022, counsel for Lewis Brisbois contacted counsel for RDC
16 and requested an extension until January 16, 2023 for Lewis Brisbois to file a response to the Second
17 Amended Third-Party Claims, due to pendency of the holiday season and to allow sufficient time to
18 review RDC's allegations;

19 NOW, THEREFORE, RDC and Lewis Brisbois hereby enter into the following stipulation:

20 **STIPULATION**

21 1. Lewis Brisbois shall have up to and including Monday, January 16, 2023, in which
22 to file a response to RDC's Second Amended Third-Party Claims.

23 2. The stipulated extension of time for Lewis Brisbois to file a response to RDC's
24 Second Amended Third-Party Claims does not operate as any admission against interest by RDC,
25 nor does it operate as a waiver of any objection or defense that Lewis Brisbois may have with regard
26 to the claims set forth in the Second Amended Third-Party Claims [ECF No. 217], to the jurisdiction
27 or venue of this Court, or to service and service of process.
28

This is Lewis Brisbois' first request for an extension. RDC and Lewis Brisbois' stipulation is not intended for an improper purpose or to cause delay, but is the result of good faith discussions between counsel.

DATED this 29th day of December, 2022.

DATED this 29th day of December, 2022.

FISHER & PHILLIPS LLP

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Development Company, LLC*

ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

Dated: December 29, 2022